

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>IN RE:</b>	§	
	§	
<b>CHARLES P. COWIN.</b>	§	<b>CASE NO. 10-31478-H4-11</b>
	§	<b>(Chapter 11)</b>
	§	
<b>DEBTOR</b>	§	

**DEBTOR'S MOTION TO EXTEND TIME TO FILE  
SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

**THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 20 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

Charles P. Cowin (the "Debtor") files this Motion to Extend Time To File Schedules and Statement of Financial Affairs (the "Motion"), and in support thereof, would respectfully show unto the Court as follows:

1. The Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code on February 24, 2010 (the "Date of Petition"). From and since the Date of Petition, the Debtor has maintained possession of its property, and remains in control of its ongoing business affairs, as a Debtor-in-Possession pursuant to the provisions of 11 U.S.C. §§ 1107 and 1108.

2. Pursuant to Federal Rules of Bankruptcy Procedure 1007(c), the Debtor's

Schedules and Statement of Financial Affairs are due March 10, 2010. Debtor requests an extension of time to file its schedules and statement of financial affairs until March 22, 2010.

3. An extension is necessary because the bankruptcy filing has placed an additional burden on Debtor's representative who is working diligently to carry out the Debtor's normal operations while complying with the requirements of the Office of the United States Trustee.

4. Debtor believes it is in the best interest of the estate to extend time for filing its Schedules and Statement of Financial Affairs because it will enable the Debtor sufficient time to gather all of the necessary information and will assure that the Statement of Financial Affairs and Schedules will be accurate.

5. Federal Rule of Bankruptcy Procedure 1007(c) provides that an extension of time may be granted to file Schedules and the Statement of Financial Affairs "only on motion cause shown and on notice to the United States Trustee and to any [official] committee. . . , trustee, examiner or other party as the court may direct." The Debtor is serving this Motion on the United States Trustee, the Debtor's twenty largest unsecured creditors, any parties who requested special notice and other parties as set forth in the Proof of Service of the Motion.

WHEREFORE, PREMISES CONSIDERED, the Debtor prays for this Court to grant the Debtor's Motion to Extend Time To File Schedules and Statement of Financial Affairs; that the time for filing the Debtor's Schedules and Statement of Financial Affairs be extended to March 22, 2010; and for such other and further relief to which Debtor may be entitled.

Respectfully submitted this 10th day of March, 2010.

FUQUA & KEIM, L.L.P.

By: /s/ Richard L. Fuqua  
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Counsel for the Debtor

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Motion to Extend Time To File Schedules and Statement of Affairs was forwarded by ECF or first class mail United States postage prepaid, to the parties on the attached service on the 11th day of March, 2010.

/s/ Richard L. Fuqua  
Richard L. Fuqua